

EXHIBIT 13

1 CASINO COOLIDGE

2 A. Um.

3 Q. Phyllis is the mother of all
4 five children?

5 A. Yes.

6 Q. I assumed that, I just wanted
7 to clarify.

8 A. Yes.

9 Q. Zoe, Stella and Leah are
10 daughters, correct?

11 A. Ava, Zoe, Stella and Leah are
12 daughters, yes.

13 Q. Ava I would think would be a
14 female name, correct?

15 A. Correct.

16 Q. Okay. So Aaron is your only
17 son?

18 A. Right.

19 Q. Are all five of your children
20 residents of New York State in one way or
21 the other?

22 A. Yes.

23 Q. Do they all live in reasonable
24 close proximity to you in Manhattan?

25 A. Four are in Brooklyn, one is in

1 CASINO COOLIDGE

2 Manhattan.

3 Q. Okay. Which one is in
4 Manhattan?

5 A. Ava.

6 Q. Is she married?

7 A. Yes.

8 Q. What's her married name?

9 A. Ava Liberman.

10 Q. She retained her maiden name as
11 her married name?

12 A. Yes.

13 Q. Okay, good for her.

14 So that gives us a little bit
15 of a background look at the Liberman Group.
16 Are any of them working full time for the
17 Liberman Group?

18 A. No.

19 Q. Each has their own life and
20 jobs and employment outside of the Liberman
21 Group?

22 A. Yes.

23 Q. Okay. So anyway, we've talked
24 -- turning back to Exhibit 1, we've talked
25 about category 25, we'll look at the